

From: [Palma, Elizabeth](#)
To: [Palma, Elizabeth](#)
Subject: 15_CT RACT Info_August 2017 Emails
Date: Friday, October 12, 2018 10:08:12 AM

From: Cohen, Michael
Sent: Monday, August 07, 2017 11:59 AM
To: Eyth, Alison <Eyth.Alison@epa.gov>
Cc: Timin, Brian <Timin.Brian@epa.gov>; Possiel, Norm <Possiel.Norm@epa.gov>; Risley, David <Risley.David@epa.gov>; McKinley, Gobeail <McKinley.Gobeail@epa.gov>
Subject: RE: CT RACT

Alison:

Gobeail sent me the approved CT RACT rule. I'll include the changes below in the file I send so you don't need to do anything with this email but I wanted to confirm that we are now going to be addressing this issue!

- Phase 2 begins June 1, 2023 so this is what we will model. Note that there would be no change in the analysis below if we used Phase 1.
- I hand checked each of the boilers in either winter or summer time periods. Below is a list of changes:
 - Middletown (562/3) Summer 108 tons -> 54 tons, Winter 51 tons -> 35 tons
 - Middletown (562/4) Summer 6 tons -> 5 tons
- I hand checked each of the combustion turbines. Below is a list of changes:
 - Devon (544/11) Summer 1 ton -> 0 tons
 - Devon (544/12) Summer 2 tons -> 0 tons
 - Devon (544/13) Summer 2 tons -> 0 tons
 - Devon (544/14) Summer 2 tons -> 0 tons
- I hand checked each of the combined cycles. There were no changes.

From: Eyth, Alison
Sent: Thursday, August 03, 2017 9:23 AM
To: Cohen, Michael <Cohen.Michael@epa.gov>
Cc: Timin, Brian <Timin.Brian@epa.gov>; Possiel, Norm <Possiel.Norm@epa.gov>; Risley, David <Risley.David@epa.gov>
Subject: FW: CT RACT

Michael,

Are we considering this in our new flat file?

Alison

From: McKinley, Gobeail
Sent: Wednesday, August 02, 2017 2:00 PM
To: Eyth, Alison <Eyth.Alison@epa.gov>
Subject: RE: CT RACT

Does the information below help you?

In the attainment SIP submitted prior to RACT being finalized CT stated the following:
CT DEEP is also currently pursuing replacement of RCSA section 22a-174-22 with RCSA section 22a-174-22e to update the emissions limits for fuel-burning equipment located at major sources of NOx. The new RACT emission limits, when fully implemented, will be generally consistent with RACT-based emission limits now in place in New York and New Jersey. The new emission limits are phased-in to provide owners and operators with adequate time to plan, budget, hire contractors, and install new control technology or new emission units. Phase 1, as proposed, applies from June 1, 2018 through May 31, 2022, and Phase 2 applies June 1, 2022 forward. With the full implementation of more stringent emissions limits in Phase 2, CT DEEP also proposes to end the state's NOx emission trading program. New RCSA section 22a-174-22e was proposed on May 2, 2016 and the public hearing was held on June 8, 2016.⁷² CT DEEP is moving the proposal towards adoption on a schedule to allow for an effective date no later than December 31, 2016, assuming timely approval is received from the Legislative Regulations Review Committee. Upon full implementation, CT DEEP estimates actual **NOx emission reductions from the EGUs regulated by RCSA section 22a-174-22e to be about 395 tons per year.** FN73

Footnote 73 - The avoided tons of NOx for the EGU sector is estimated based on the weighted monthly averages of historical operations data during the months of January and July in 2010-2015. The reduction estimates reflect historical actual operations. Reductions in potential emissions would be much higher. Historical emissions show that actual NOx emissions have decreased since 2005. Potential emissions do not equal actuals for these units since actual operations have been erratic, particularly in recent years. For the regulated EGUs overall, actual NOx emissions have decreased since 2005, generally due to a reduction in hours of operation for many of the units with higher emission rates.

Thanks,
Gobeail McKinley
US EPA Office of Air Quality Planning and Standards
109 TW Alexander Drive (C539-04)
Research Triangle Park, NC 27711
919-541-5246
mckinley.gobeail@epa.gov

From: Eyth, Alison
Sent: Wednesday, August 02, 2017 1:30 PM
To: McKinley, Gobeail <McKinley.Gobeail@epa.gov>
Subject: RE: CT RACT

Hi Gobeail,

We need emissions reductions (limits won't help us since we don't know the starting point).

We could use tons/day. We need to know what types of source are impacted and will need to determine which specific sources are affected to fold them into the inventories we use for modeling.

Thanks,

Alison

From: McKinley, Gobeail

Sent: Wednesday, August 02, 2017 1:23 PM

To: Eyth, Alison <Eyth.Alison@epa.gov>

Subject: CT RACT

Hi Alison,

What type of information are you seeking to inform changes in the NEI for CT RACT? Emission limits or tons per day reductions?

Thanks,

Gobeail McKinley

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